1 2 3 4 5 6 7 8	COX, WOOTTON, GRIFFIN, HANSEN & POULOS, LLP Richard C. Wootton (SBN 88390) Galin G. Luk (SBN 199728) 190 The Embarcadero San Francisco, California 94105 Telephone No.: (415) 438-4600 Facsimile No.: (415) 438-4601 Attorneys for Defendant, TUTOR-SALIBA/KOCH/TIDEWATER JV UNITED STATES	DISTRICT COURT	
9			
10	NORTHERN DISTRICT OF CALIFORNIA		
11	SAN FRANCIS	SCO DIVISION	
12	ROBERT GOLDSWORTHY,	Case No.: C 06-4025 MHP	
13	Plaintiff,	STIPULATION TO CONTINUE	
14	vs.)	DISCOVERY DEADLINES; [PROPOSED] ORDER THEREON	
15	Tutor-Saliba/Koch/Tidewater JV, Westar) Marine Services, Cross Link, Inc., and DOES 1-)		
16	10, in personam, and M/V PROWLER & M/V)		
17	ROVER, their engines, tackle, apparel, furniture, etc., <i>in rem</i> ,		
18	Defendants.))	
19			
20	Plaintiff Robert Goldsworthy, defendant Cross Link, Inc. dba Westar Marine Services, and		
21	defendant Tutor-Saliba/Koch/Tidewater, JV, by and through their respective counsel of record,		
22	hereby stipulate to and respectfully request the Court enter an Order to continue:		
23	1) the last day to disclose trial witnesses from July 30, 2007 to August 24, 2007;		
24	2) percipient discovery cutoff from August 31, 2007 to September 7, 2007;		
25	3) the last day to disclose experts and reports from September 7, 2007 to September 14, 2007;		
26	4) the last day to supplement disclosure of experts from September 18, 2007 to September 28,		
27	2007;		
28	5) the close of expert discovery from September 28, 2007 to October 12, 2007.		
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	STIPULATION TO CONTINUE DISCOVERY Case No. C 06-4025 MHP DEADLINE; [PROPOSED] ORDER THEREON		

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The parties have engaged in substantial written discovery including interrogatories and document requests, and have subpoenaed records from third parties, including medical providers. Hundreds of pages of documents have been produced and are being reviewed. Similarly, hundreds of pages of medical records pertaining to plaintiff have been subpoenaed and are currently being analyzed. The deposition of plaintiff is scheduled for July 16, 2007 to allow sufficient time to complete necessary pre-deposition discovery. The depositions of treating doctors will follow thereafter. The parties agree and respectfully suggest that completion of the discovery deadlines is necessary in order for there to be a useful mediation. The parties therefore also agree and respectfully suggest that for these reasons, a continuance of the discovery deadlines, is reasonably necessary and is supported by good cause.

THEREFORE, plaintiff and defendants hereby stipulate to continue the following dates:

- 1) the last day to disclose trial witnesses from July 30, 2007 to August 24, 2007;
- 2) percipient discovery cutoff from August 31, 2007 to September 7, 2007;
- 3) the last day to disclose experts and reports from September 7, 2007 to September 14, 2007;
- 4) the last day to supplement disclosure of experts from September 18, 2007 to September 28, 2007;
- 5) the close of expert discovery from September 28, 2007 to October 12, 2007.

Accordingly, plaintiff and defendants hereby respectfully request that the Court continue the discovery deadlines as suggested above.

IT IS SO STPULATED:

Dated:

STERLING & CLACK Rex M. Clack David E. Russo

By: David Russo Attorneys for Defendant, CROSS LINK, INC. dba WESTAR MARINE SERVICES

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1	Dated: BANNING MICKLOW & BULL, LLP	
2		
3	By:	
4	Edward M. Bull III	
5	Attorneys for Plaintiff ROBERT GOLDSWORTHY	
6		
7		
8	Dated: COX, WOOTTON, GRIFFIN, HANSEN & POULOS, LLP	
9		
10	By:	
11	Galin Luk	
12	Attorneys for Defendant TUTOR-SALIBA/KOCH/TIDEWATER JV	
13		
14	I, Galin G. Luk, hereby attest that counsel for defendant Westar and counsel for	
15	plaintiff Robert Goldsworthy have authorized me to conform their signature to this	
16	efile.	
17		
18	D /G/	
19	By: <u>/S/</u> Galin Luk	
20	Attorneys for Defendant TUTOR-SALIBA/KOCH/TIDEWATER JV	
21	TOTOR BILLIPING CITY TIPE WITH EACH	
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ORDER

Having reviewed and considered the parties' request and stipulation to continue discovery deadlines, and good cause appearing therefor,

THE COURT HEREBY ORDERS THE FOLLOWING:

- 1) the last day to disclose trial witnesses is continued from July 30, 2007 to August 24, 2007;
- 2) percipient discovery cutoff is continued from August 31, 2007 to September 7, 2007;
- 3) disclosure of experts and reports is continued from September 7, 2007 to September 14,2007;
- 4) supplemental disclosure of experts is continued from September 18, 2007 to September 28, 2007:
- 5) close of expert discovery is continued from September 28, 2007 to October 12, 2007.

Dated: July ___11____, 2007

